CORRES. CONTROL
INCOMING LTR NO.

01652 RF 94

DUE DATE

ACTION DIST.	LTR	ENC
BERMAN, H.S.		
CARNIVAL, G.J.		
COPP, R.D.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
FRANZ, W.A.		
HANNI, B.J.		
HEALY, T.J.		
HEDAHL, T.G.	X	
HILBIG, J.G.		
HUTCHINS, N.M.		
KELL, R.E.		
KIRBY, W.A.		
KUESTER, A.W.		
MAHAFFEY, J.W.		
MANN, H.P.		
MARX, G.E.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SETLOCK, G.H.		
STIGER, S.G.	X	
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILSON, J.M.		

CORRES CONTROL	x	x
ADMN RECORD/080	X	X
PATS/ T130G		

Reviewed for Addressee
Corres. Control RFP

4/25/94 CAL
DATE BY

Ref Ltr. #

DOE ORDER # 5400.3

RF-46522 (Rev. 01/94)

Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

000027650

APR 25 3 15 PM '94

APR 2 2 1994

EG&G ROCKY FLATS PLANT
CORRESPONDENCE CONTROL
94-DOE-04655

Frederick R. Dowsett, Ph.D., Chief
Colorado Department of Health
Monitoring and Enforcement
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Dr. Dowsett:

Several actions are currently in progress or have been taken in order to ensure appropriate response to spills since the March 10, 1994 spill of water diverted from South Walnut Creek to the OU2 Interim Measure/Interim Remedial Action (IM/IRA) surface water field treatability unit. A summary of these actions is attached. In the future, all hazardous waste spills will be managed in accordance with the revised Colorado Department of Health (CDH) approved RCRA contingency plan which is effective on April 23, 1994. By implementing the RCRA contingency plan, we are in compliance with the Colorado Hazardous Waste Regulations (CHWR) spill response requirements, and immediate actions to control spills and clean up standing water and the visibly wetted soil will be taken. Soils will ultimately be remediated if analysis shows that hazardous waste is present.

EG&G has recently reaffirmed guidance to the Rocky Flats Plant for spill response (H. P. Mann to S. G. Stiger, "Release Response and Reporting Requirements"-HPM-354-94 and -HPM-380-94) which I understand were faxed to your office. Because the guidance in these documents is very conservative and does not distinguish among spill types (CHWR vs. non-CHWR regulated, for example), the DOE has under study, and will propose, a more cost-effective spill response and reporting program that meets or exceeds the regulatory requirements applicable to the particular spilled material. We propose that a meeting be arranged between both the RCRA and CERCLA people of the Department of Energy, EG&G, CDH and the Environmental Protection Agency at 8:00 am May 6, 1994, but in any case no later than May 20, 1994, to discuss our proposal and ensure that prompt RCRA spill response actions will be acceptable to all agencies regulating DOE activities, especially in Interagency Agreement controlled Operable Units.

Brandon Williamson of the Environmental Restoration staff will be coordinating the meeting. He may be reached at 966-5276.

for David Ruscitto
Acting Assistant Manager for
Operations & Waste Management

ADMIN RECORD
BZ -A-00156

Enclosure

cc w/Enclosure:
J. Roberson, ER, RFO
S. Olinger, ER, RFFO
M. McBride, ER, RFFO
F. Lockhart, ER, RFFO
B. Thatcher, ER, RFFO
B. Williamson, ER, RFFO
J. Stewart, ER, RFFO
B. McCarthy, ER, RFFO
F. Gerdeman, ES&H, RFFO
D. Grosek, OWM, RFFO
J.Leifer, OWM, RFFO
M. Hestmark, EPA
G. Baughman, CDH
B. Fraser, EPA
J. Schiefflein, CDH
D. Norberry, CDH
S. Stiger, EG&G
T. Hedahl, EG&G

Near Term Corrective and Preventative Actions for OU-2 Spills

Issue: Immediate containment was not performed

Action: EG&G interoffice correspondence (H. P. Mann to S. G. Stiger, Release Response and Reporting Requirements-HPM-354-94 and -HPM-380-94) reaffirms the necessary steps required to respond to a hazardous waste spill in accordance with the RCRA contingency plan. The operators of the field treatability unit have been briefed on the actions they are expected to take. Spill kits are available at OU-2. EG&G has also committed that shovels and an additional spill response kit will be located at an accessible point along the pipeline to facilitate timely containment.

Additionally, several preventative measures are being, or have been, implemented. They include the following:

- Surveillance of the pipeline has been increased from once a day to every four hours. This will provide earlier warning of problems developing with the influent piping and allow a quicker response.

- Readings of pick up flow including calculations for influent volume have been increased from 1hr to 1/2 hour. This increase allows the operators to identify and respond to any en-route (from stream to treatment unit) leaks in the primary side of the piping system in a more timely manner.

- Permanent power is scheduled to be in place at OU2 water treatment unit by July 1, 1994. This will allow the present on-line generator to be used as a back-up generator, thereby reducing periods of non-collection which will reduce the amount of water that overflows the weirs.

- Additional storage tanks have been ordered and are scheduled to be installed near the existing tank by July 1, 1994. These tanks will allow collection of stream water for longer periods of time while the treatment units are out of service for cleaning or maintenance.

- Operations are arranged to minimize potential overflows during downtime by pumping out the weirs and influent storage tank prior to scheduled shut-downs.

Issue: Immediate cleanup of soil was not done

Action: EG&G interoffice correspondence (as referenced above) reaffirms the responsibility for performing the necessary steps required to appropriately respond to a hazardous waste spill. The operators of the field treatability unit have been briefed on the requirements of the RCRA contingency plan (i.e. cleanup soil determined to be visibly affected by the spill).

Issue: Ownership and accountability in the spill response decision making process were unclear.

Action: EG&G interoffice correspondence (as referenced above) reaffirms the responsibility for performing the necessary steps required to appropriately respond to a hazardous waste spill. The management and operators of the field treatability unit have been briefed on their responsibilities regarding spill response.

Issue: Notification to CDH regarding the amount of water released on March 10, 1994 was initially incorrect.

Background: OU2 water that currently is not collected overflows the weir and goes down the creek to pond B-5. The final "Surface Water IM/IRA Environmental Assessment and Decision Document, South Walnut Creek Basin" dated March 8, 1991 states, "Design flow rates for surface water collection systems CS-59, CS-61, and CS-132 are based on flows from stations SW-59, SW-61, and SW-132, respectively. The design flow rates are maximum flows observed in the 1988, 1989, and 1990 field investigations, excluding flows related to high precipitation events. Only design flows will be collected from the South Walnut Creek Basin surface water monitoring stations." The document goes on to say that excess flow is permitted to overflow the weirs.

The two hundred gallons of water initially reported was the estimate made by the Operable Unit 2 (OU2) surface water field treatability unit personnel of the amount of water that contacted the soil. An apparent regulatory conflict led to the neglect of reporting the 6000 gallons that was estimated to have reentered the stream. The 6000 gallons was added to the 200 gallon estimate for inclusion in the RCRA Contingency Plan Implementation Report. Because the water from the secondary side of the piping returned to the weir and overflowed, the view of the incident the responders took was that the overflow was permitted.

Action: The operators and management of the field treatability unit have since been briefed to consider the event a release. The DOE is preparing a letter to EG&G reaffirming their requirement to evaluate the actions taken to ensure they were performed in accordance with the regulations.